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5 Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State  
of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

6  
7 THE UNITED STATES BANKRUPTCY COURT  
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 In re: ) Case Nos. 19-30088 (DM)

10 PG&E CORPORATION, ) Chapter 11

11 -and-

12 In re: )  
13 )  
14 PACIFIC GAS AND ELECTRIC )  
COMPANY, )  
15 Debtors. )  
16 ☐ Affects PG&E Corporation )  
17 ☐ Affects Pacific Gas and Electric )  
Company )  
18 ☒ Affects both Debtors )  
19 )

20 \* All papers shall be filed in the lead case,  
No. 19-30088(DM)

21 )  
22 )  
23 )  
24 )  
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26 )  
27 )  
28 )  
DATE: October 7, 2019  
TIME: 10:00 A.M.  
PLACE: Courtroom 17  
450 Golden Gate Avenue,  
16<sup>th</sup> Fl.  
San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKET NO.: 3940

26 The Plaintiffs' Executive Committee appointed by the Superior Court of the State of  
27 California, in and for the County of Alameda, in Case No. RG16843631 and related cases  
28 ("hereinafter referred to as the "Ghost Ship Warehouse Plaintiffs' Executive Committee"),

1 party in interest in the above-referenced Chapter 11 cases, by and through its attorneys of  
2 record, hereby joins in and supports the Joint Motion of the Official Committee of Tort  
3 Claimants and Ad Hoc Committee of Senior Unsecured Noteholders to Terminate the  
4 Debtors' Exclusive Periods Pursuant to Section 1121(d)(1) of the Bankruptcy Code  
5 (hereinafter referred to as the "Exclusivity Termination Motion") (Docket No. 3940).

## 6 **INTRODUCTION**

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8 The Ghost Ship Warehouse Plaintiffs' Executive Committee was appointed by the  
9 Superior Court of the State of California, in and for the County of Alameda (hereinafter  
10 referred to as the "Superior Court") in Case No. RG16843631 and related cases, which is  
11 based on claims arising out of the catastrophic fire that took place on December 2, 2016,  
12 (hereinafter referred to as the "Ghost Ship Plaintiff Cases"). On December 2, 2016, a fire  
13 broke out at the building located in City of Oakland, County of Alameda, State of California,  
14 bearing Assessor's Parcel Numbers 25-690-10 and 25-690-11, commonly known as the  
15 "Ghost Ship Warehouse." The fire at the Ghost Ship Warehouse resulted in thirty-six (36)  
16 deaths, the youngest individual to die was seventeen (17) years old, and many others  
17 suffered personal injuries and incurred other damages.

18 There are numerous civil actions pending in the Superior Court, which are being  
19 maintained via a "Master Complaint" pending scheme before Honorable Brad Seligman.  
20 The plaintiffs in the Ghost Ship Plaintiff Cases (hereinafter referred to as the "Ghost Ship  
21 Plaintiffs") have adopted the Second Amended Master Complaint, which is operative  
22 against the Debtors<sup>1</sup>, and was filed with the Superior Court on January 19, 2018.

23 In many ways, the tragedy at the Ghost Ship Warehouse has been over shadowed  
24 by the subsequent catastrophic wildfires, which occurred in 2017 and 2018. It must be  
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27 <sup>1</sup> A Third Amended Complaint was filed on April 24, 2019, to amend the allegations against the  
28 City of Oakland, another Defendant. Due to the Automatic Stay, the Third Amended Complaint has not  
been served on the Debtors.

1 realized; however, that the Ghost Ship Plaintiffs are numerous and have significant claims  
2 against these Debtors.

### 3 JOINDER AND STATEMENT

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5 The Ghost Ship Warehouse Plaintiffs' Executive Committee believes that the  
6 Exclusivity Termination Motion will foster competition, which will benefit all creditors. While  
7 nothing herein should be considered as support for the Term Sheet, proposed jointly by the  
8 Official Committee of Tort Claimants (hereinafter referred to as the "TCC") and Ad Hoc  
9 Committee of Senior Unsecured Noteholders (hereinafter referred to as the "Bondholders");  
10 however, the Ghost Ship Warehouse Plaintiffs' Executive Committee joins in and supports  
11 the Exclusivity Termination Motion.

12 The Ghost Ship Warehouse Plaintiffs' Executive Committee does hereby reserves  
13 the right to join in and support any additional pleadings filed by TCC, Bondholders,  
14 creditors, and other parties in interest with regards to the Exclusivity Termination Motion.

### 15 CONCLUSION

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17 Based upon the instant Joinder and the arguments to be presented during the  
18 hearing on October 7, 2019, the Ghost Ship Warehouse Plaintiffs' Executive Committee  
19 respectfully requests that the Exclusivity Termination Motion be granted.

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21 Dated: October 4, 2019

Respectfully submitted,  
22 PINO & ASSOCIATES

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24 By: /s/ Estela O. Pino  
25 Estela O. Pino, Attorneys for the Ghost Ship  
26 Warehouse Plaintiffs' Executive Committee  
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